

EXHIBIT A



June 14, 2023

Citizen Suit Coordinator
U.S. Department of Justice
Environmental and Natural Resources Division
Law and Policy Section
950 Pennsylvania Avenue NW, Room 2615
Washington, DC 20530

Re: Conservation Law Foundation v. Prolerized New England et al.,
Case No. 1:22-cv-10295-AK

Dear Citizen Suit Coordinator,

This letter relates to the Consent Decree in the above referenced case which was lodged with the U.S. District Court for the District of Massachusetts and submitted to your office on May 9, 2023. At the request of the Department of Justice, this letter provides additional information on payments to a third party as part of the Department's review of the Consent Decree.

Section VII of the Consent Decree directs Defendants to pay \$525,000 to four Implementing Organizations. Pursuant to Exhibit B to the Consent Decree, GreenRoots will receive \$175,000 to support a waterfront remediation and dam removal project. This letter sets forth the general goals, terms, and conditions upon which GreenRoots intends to carry out the responsibilities set forth in the Consent Decree.

GreenRoots is a tax-exempt entity under Sec. 501(c)(3) of the Internal Revenue Code. We have read the Consent Decree and will spend any monies received under the Consent Decree only for the purposes specified in the Consent Decree. No portion of any money received under the Consent Decree will be used for any lobbying purposes. GreenRoots will submit an annual status report to the Parties each year the funds are being spent at the times and containing the components specified in Exhibit B of the Consent Decree. GreenRoots will comply with all guidelines and restrictions in the Consent Decree, including those governing changes to projects and unspent funds.

The funds designated by the Consent Decree will be used by GreenRoots for waterfront remediation at the Chelsea Creek, Mill Creek, and Island End River waterfronts in the Mystic River Watershed. To complete the remediation project, GreenRoots will conduct soil testing and remediation, invasive species removal and climate resiliency planning and implementation. GreenRoots will seek meaningful public engagement throughout all of these processes. This project will improve water quality, create healthier estuarine environments, promote climate resilience, and ensure public access. Work will include, as necessary: soil testing and/or remediation, bank stabilization to prevent erosion, landscaping, green infrastructure, removal of phragmites and other invasive species, salt marsh and other habitat restoration, and/or tree plantings.

In addition, GreenRoots will use project funds to work with the City of Chelsea and Mystic River Watershed Association to remove Slades Mill Dam. Slades Mill Dam is a silt dam located on Mill

Creek which is impacting tidal flow and has resulted in an environment that is conducive to the spread of the invasive species phragmites. Removal of this dam will improve water quality and strengthen the health of the river ecosystem.

We appreciate the opportunity to improve our community's waters.

Sincerely,

A handwritten signature in black ink that reads "Roseann T. Bongiovanni". The signature is fluid and cursive, with a long horizontal flourish extending from the end.

Roseann Bongiovanni
Executive Director



June 15, 2023

Citizen Suit Coordinator
U.S. Department of Justice
Environmental and Natural Resources Division
Law and Policy Section
950 Pennsylvania Avenue NW, Room 2615
Washington, DC 20530

Re: Conservation Law Foundation v. Prolerized New England et al.,
Case No. 1:22-cv-10295-AK

Dear Citizen Suit Coordinator,

This letter relates to the Consent Decree in the above referenced case which was lodged with the U.S. District Court for the District of Massachusetts and submitted to your office on May 9, 2023. At the request of the Department of Justice, this letter provides additional information on payments to a third party as part of the Department's review of the Consent Decree.

Section VII of the Consent Decree directs Defendants to pay \$525,000 to four Implementing Organizations. Pursuant to Exhibit B to the Consent Decree, the Mystic River Watershed Association (MyRWA) will receive \$100,000 to support a water quality monitoring project in the Mystic River Watershed. This letter sets forth the general goals, terms, and conditions upon which MyRWA intends to carry out the responsibilities set forth in the Consent Decree.

MyRWA is a tax-exempt entity under Sec. 501(c)(3) of the Internal Revenue Code. We have read the Consent Decree and will spend any monies received under the Consent Decree only for the purposes specified in the Consent Decree. No portion of any money received under the Consent Decree will be used for any lobbying purposes. MyRWA will submit an annual status report to the Parties each year the funds are being spent at the times and containing the components specified in Exhibit B of the Consent Decree. MyRWA will comply with all guidelines and restrictions in the Consent Decree, including those governing changes to projects and unspent funds.

MyRWA will conduct water quality monitoring in the Mystic River Watershed. MyWRA will conduct sampling work that will include monthly monitoring of pollutant levels for three years at six sites. Following the sampling and laboratory analysis of samples, MyRWA will identify hotspots of high pollution levels and communicate the sampling results to the public and decisionmakers in order to prioritize and accelerate the implementation of water quality solutions.

In addition, MyRWA will execute an investigation focusing on three long-neglected streams in the Mystic River Watershed which run through environmental justice communities— Malden River, Alewife Brook, and Mill Creek. MyRWA will analyze available data and conduct new investigations on these three streams and then present the findings to the public and municipalities. The purpose

of the public forum will be to identify, in collaboration with the public, solutions to the water quality issues caused by stormwater pollution.

We appreciate the opportunity to improve our community's waters.

Sincerely,

A handwritten signature in black ink, reading "Patrick Heron". The signature is written in a cursive, flowing style.

Patrick Heron
Executive Director
Mystic River Watershed Association



Nipmuc Indian Development Corporation
Hassanamesit Reservation
80 Brigham Hill Road
Grafton, MA 01519

June 16, 2023

Citizen Suit Coordinator
U.S. Department of Justice
Environmental and Natural Resources Division
Law and Policy Section
950 Pennsylvania Avenue NW, Room 2615
Washington, DC 20530

Re: Conservation Law Foundation v. Prolerized New England et al.,
Case No. 1:22-cv-10295-AK

Dear Citizen Suit Coordinator,

This letter relates to the Consent Decree in the above referenced case which was lodged with the U.S. District Court for the District of Massachusetts and submitted to your office on May 9, 2023. At the request of the Department of Justice, this letter provides additional information on payments to a third party as part of the Department's review of the Consent Decree.

Section VII of the Consent Decree directs Defendants to pay \$525,000 to four implementing organizations. Pursuant to Exhibit B to the Consent Decree, the Nipmuc Indian Development Corporation (NIDC) will receive \$100,000 to support an environmental quality assessment project. This letter sets forth the general goals, terms, and conditions upon which NIDC intends to carry out the responsibilities set forth in the Consent Decree.

NIDC is a tax-exempt entity under Sec. 501(c)(3) of the Internal Revenue Code. We have read the Consent Decree and will spend any monies received under the Consent Decree only for the purposes specified in the Consent Decree. No portion of any money received under the Consent Decree will be used for any lobbying purposes. NIDC will submit an annual status report to the Parties each year the funds are being spent at the times and containing the components specified in the Consent Decree. NIDC will comply with all guidelines and restrictions in the Consent Decree, including those governing changes to projects and unspent funds.

NIDC's project will evaluate recent studies documenting the water quality of the Blackstone River, the survival of native plants and wildlife along the banks of the River, and the survival of fish within the water. In addition, testing will be conducted on the levels of chemical, biological and other contaminants within the Blackstone River. An analysis will be done on the testing results to assess the possibility for mitigating contaminants and restoring the River's health. NIDC will present the results of the testing and analysis to the Hassanamisco Nipmuc Band, including the feasibility of



Nipmuc Indian Development Corporation
Hassanamesit Reservation
80 Brigham Hill Road
Grafton, MA 01519

implementing mitigation measures, the feasibility of the River's survival, and whether humans and their more-than-human kin (nature and wildlife) will once again be able to drink and eat from the River. The results will also be made available to the public for the purpose of generating further local support for improving the River's water quality.

We appreciate the opportunity to improve our communities' waters.

Sincerely,

A handwritten signature in black ink, appearing to read 'Cheryl Toney Holley'.

Cheryll Toney Holley

Chief, Hassamanisco Nipmuc Band

Clerk, Nipmuc Indian Development Corporation

June 14, 2023

Citizen Suit Coordinator
U.S. Department of Justice
Environmental and Natural Resources Division
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950 Pennsylvania Avenue NW, Room 2615
Washington, DC 20530

**The Blackstone
River Coalition**

Re: Conservation Law Foundation v. Prolerized New England et al.,
Case No. 1:22-cv-10295-AK

Dear Citizen Suit Coordinator,

This letter relates to the Consent Decree in the above referenced case which was lodged with the U.S. District Court for the District of Massachusetts and submitted to your office on May 9, 2023. At the request of the Department of Justice, this letter provides additional information on payments to a third party as part of the Department's review of the Consent Decree.

Section VII of the Consent Decree directs Defendants to pay \$525,000 to four Implementing Organizations. Pursuant to Exhibit B to the Consent Decree, the Blackstone River Coalition (BRC) will receive \$150,000 to support water quality improvements in the Blackstone River Watershed. This letter sets forth the general goals, terms, and conditions upon which BRC intends to carry out the responsibilities set forth in the Consent Decree.

BRC is a tax-exempt entity under Sec. 501(c)(3) of the Internal Revenue Code. We have read the Consent Decree and will spend any monies received under the Consent Decree only for the purposes specified in the Consent Decree. No portion of any money received under the Consent Decree will be used for any lobbying purposes. BRC will submit an annual status report to the Parties each year the funds are being spent at the times and containing the components specified in Exhibit B of the Consent Decree. BRC will comply with all guidelines and restrictions in the Consent Decree, including those governing changes to projects and unspent funds. BRC's projects will focus on water quality monitoring, restoration of public space along the Blackstone River, and community education. To monitor water quality in the Blackstone River, volunteer members of BRC will collect water quality samples at 75 sampling sites throughout the Blackstone River Watershed once per month between April and November. The results of this sampling will help member groups of the BRC and other stakeholders better understand the assets and threats to the watershed and advocate for actions that will improve the water quality of the Blackstone River. BRC will include the sampling results in public-facing materials to illustrate the ongoing need for river protection and foster a sense of stewardship in the general public.

BRC will also restore Granite Park, which has fallen into disrepair. This project will include the removal of invasive knotweed plants; planting native trees to create native bird habitat; planting native pasture grass; clearing access to the Blackstone River for water quality testing by BRC; and mowing knotweed three times per year.

The Blackstone River
Coalition is a partnership
of numerous organizations,
businesses, municipalities,
agencies and individuals
working to restore the
Blackstone River and to
improve the health of the
Blackstone River watershed.



In addition, Blackstone River educators will partner with schools in Worcester and Millbury to lead students in field activities along the Blackstone River and bike trail, including litter pickup, water quality monitoring, and control of invasive species. Students will install pet waste bag dispensers and multilingual signage about pet waste and littering along the Blackstone River bike trail.

We appreciate the opportunity to improve our communities' waters.

Sincerely,



Peter Coffin
BRC Coordinator